

EXHIBIT A

January

2024

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1 New Year's Day	2	3	4	5	6
7	8	9	10 TRO entered	11	12 Receiver temporarily shuts down StratFS	13
14 Martin Luther King Jr. Day	15	16 Service of TRO on Jason Blust	17	18	19	20
21 Receiver re-opens StratFS on limited basis – 78 employees	22	23 First Receiver contact – L. Smith telephone call	24 Series of emails - Never calls	25 with L. Smith back	26	27
28	29	30	31			

EXHIBIT B

Rodney O. Personius

From: Rodney O. Personius
Sent: Thursday, January 25, 2024 4:42 PM
To: Logan Smith; Thomas McNamara
Subject: RE: Follow-up

Logan: Today is difficult. I finished a deposition mid-afternoon, and then went directly into a virtual conference, followed by an office meeting. Our son has a swim meet in ½ hour. Senior Night. Running to that now.

Can we set a time tomorrow to talk? I will be drafting a submission that is due by the close of business all day. So, I am available.

In terms of a concern about either of Jason's companies, Lit Def Strategies ceased operations upon entry of the TRO (all employees laid off), and Relialit has been out of business since 2019.

I apologize for the delay in getting back to you. Rod

Rodney O. Personius, Esq.
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From: Logan Smith <lsmith@mcnamarallp.com>
Sent: Thursday, January 25, 2024 4:00 PM
To: Rodney O. Personius <rop@personiusmelber.com>; Thomas McNamara <tmcnamara@mcnamarallp.com>
Subject: RE: Follow-up

Hello Rod,

I'm just following up to see if you have been able to connect with your clients about the questions we had discussed in our phone call and that I put in my email. Also, there may be services that companies related to Mr. Blust's companies were performing that could help the consumer. We have brought back to work certain personnel at SFS to minimize harm to consumers and want to make sure that any urgent litigation needs of consumers in the near term are identified

and handled appropriately. Additionally, we still wish to gain an understanding of the documents, ESI, and assets of the Receivership Defendants related to Mr. Blust. Is there a time when you are available to discuss?

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From: Logan Smith
Sent: Wednesday, January 24, 2024 1:03 PM
To: 'rop@personiusmelber.com' <rop@personiusmelber.com>; Thomas McNamara <tmcnamara@mcnamarallp.com>
Subject: RE: Follow-up

Rod,

In particular, we are also interested in understanding and gaining access to LeadTrac, which we understand to be a third-party system built by National Data Systems <https://www.ndssite.com/>. We understand that no one at StratFS has access to it and that requests for access to NDS have typically been made through Mr. Blust. Could you inquire with your client and find out who owns LeadTrac and whether we could gain access to it?

Many thanks,
Logan

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From: Logan Smith
Sent: Wednesday, January 24, 2024 11:53 AM
To: rop@personiusmelber.com; Thomas McNamara <tmcnamara@mcnamarallp.com>
Subject: Follow-up

Hello Rod,

It was nice speaking with you yesterday. I appreciate your reaching out to your client Mr. Blust as to the Receivership Defendants under his control. In particular, Lit Def Strategies, LLC, Relialit, LLC, and the Blust Family Irrevocable Trust through Daniel Holmgren are Receivership Defendants under the TRO. The most pressing concerns are what we discussed yesterday, regarding (1) accessing and gaining insight into the assets, documents, and ESI of the Receivership Defendants and also (2) gaining an understanding of Relialit and Lit Def Strategies's current business operations.

The TRO provides that the receiver may continue to conduct the business of the Receivership Defendants if it can be done lawfully and profitably. There may be certain business operations of Relialit and Lit Def Strategies, LLC that are lawful. The Receiver is considering whether it is necessary to bring back any such operations in the short term (i.e., before the PI hearing next week) to minimize harm to consumers, and also the receiver will be making recommendations regarding whether the business of Receivership Defendants can be done lawfully and profitably. We are happy to discuss this with you and gain any insights you or your client may have on this.

Do you want to set up a call later today or tomorrow?

Thank you,
Logan

Logan Smith
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EXHIBIT C

February 9, 2024

Hon. Michael J. Roemer
United States Magistrate Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

Re: *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.*
Case No. 24-cv-40

Dear Judge Roemer:

As a follow up to our conference last evening wherein we stressed our client's continued concern over the manner in which the Receiver is managing the businesses of StratFS, LLC and its affiliates ("Strategic" or "Company"), we believe it is necessary to seek the Court's direction regarding specific operational issues that the Receiver has refused to adequately address.

As was mentioned in our conference last night, Strategic is aware of several critical vendors who have not received payment for services. An employee of Strategic, Brian Reiss, with whom the Receiver has interacted, has sent repeated messages to the Receiver regarding the need to pay critical vendors. The Receiver has indicated that he does not believe he is required to pay vendors for services that were rendered prior to the commencement of the Receivership on January 12th. This position is contrary to the direction of the TRO: the Receiver should continue to manage the company. Additionally, this position is contrary to the spirit of our ongoing negotiations with the Government to enter a stipulation for a Preliminary Injunction that would permit the contingent fee model of the Company to resume operations. An example of the vendors who are owed money is reflected in Exhibit A (attached). As we further discussed in our conference last evening, it is essential that Strategic personnel be allowed to negotiate directly with the vendors to arrange for appropriate payment terms of the amounts owed to them. To that end, we are requesting that pending the entry of the anticipated stipulation, the Court direct the Receiver to reinstate the controller, Cameron Ball, and procurement specialist, John Stockett, to assist the Receiver in negotiating and paying past due invoices to vendors who are instrumental to the Company's survival.

Another important issue to Strategic's survival is staffing. The level of staffing authorized by the Receiver is simply insufficient to service 75,000 clients. One of the goals of the stipulation we discussed last evening is to ensure that the existing law firm clients are properly serviced under the new contingent fee arrangement. For a month now, these consumers have not been adequately serviced by the Receiver. Again, the Company President has recommended the addition of 150 more staff to help service the consumers. This additional staff will reduce the hold times of calls made to Strategic, which have been as long as six hours. The additional staff will also assist in tackling the backlog of documents (50,000) and emails (10,000). Ironically, despite the progress made between the parties to allow the Company to resume operations, the

Receiver, just this morning, posted on the Receiver's website a notice indicating that the Receiver is mailing "conditional notice of reduction in force" to an unspecified number of Strategic employees. Due to the uncertainty of their employment status and without being provided adequate notice under applicable State and Federal WARN Act requirements, Strategic is at risk of losing important personnel. Today, in the wake of the Receiver's reduction in work force posting, four high level managers advised the Company that they had found new employment. While the parties are in earnest negotiations to allow the Company to resume the contingent fee model of the business, the Receiver is doing everything in his power to destroy the Company.

The issues raised in this letter reflect just a few of the adverse consequences of the Receiver continuing to operate in a manner that is clearly designed to shut down the Company versus managing the Company in a fashion that will allow it to survive for the benefit of the consumers and the employees. We respectfully request that the Court immediately direct the Receiver to reinstate the personnel as described above to service the consumers and to pay the vendors or negotiate extension of payment terms.

Moreover, Mr. Blust and the Intervenor Law Firms respectfully request the Court to address an issue dealing with the communications between the law firms and their clients. On February 7, outside the courtroom following oral argument, Mr. McNamara, and his counsel, Mr. Thoman, requested the assistance of Mr. Connors and Mr. Personius with respect to two matters associated with maximizing communication between personnel at Strategic and the law firms with respect to litigated matters.

The first concern related to the need for personnel at Strategic to have access to data stored in what is described as the NDS system. Mr. Connors and Mr. Personius expressed their understanding that the contents of this system constitute attorney-client protected information that should not be shared with the Receiver or his staff. Mr. McNamara acknowledged this to be the case and agreed neither he nor his staff would access this information. His sole concern is that this data be made available to personnel at Strategic. It was agreed that Mr. Connors and Mr. Personius would promptly address this request with their clients and attempt to provide a response on the following day, Thursday, Feb 8. However, before they were able to inform counsel for the Receiver that the NDS access issue was not a problem, it was learned that somehow personnel at Strategic have indeed gained NDS access. Accordingly, we understand NDS access is no longer an issue.

The second concern that was expressed during the informal discussion on February 7 pertained to reopening Lit Def Strategies, which employs a staff of six individuals, including Mr. Blust. Lit Def acts as a conduit between personnel at Strategic and the law firms with respect to litigated matters. When the TRO was issued, the across-the-board freezing of bank accounts included the account for Lit Def. Without a means of compensating the company's employees for their services, they stopped working. This same topic had been raised by a representative of the Receiver in late January but was then inexplicably abandoned as an issue. When the subject was again raised during the February 7th conversation, Mr. Connors and Mr. Personius

responded that this request also needed to be addressed with their clients. Regarding compensation, the Receiver and his counsel suggested this expense could be paid by the law firms and Mr. Blust as some type of goodwill gesture. Mr. Connors and Mr. Personius responded that the Lit Def bank account has funds that can and should be unfrozen to the extent needed to pay the company's employees for their services. This issue was not resolved during the informal discussion. Mr. Connors and Mr. Personius once again agreed that the Lit Def reopening would be immediately addressed with the law firms and Mr. Blust. Their response is that Lit Def should definitely reopen, and that the compensation expense for the six individuals, including Mr. Blust, should be paid out of the company's bank account, rather than by either the law firms or Mr. Blust personally. We respectfully request that Mr. McNamara be directed to proceed in this fashion regarding the reopening of Lit Def.

Respectfully,

/s/ Dennis C. Vacco
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*Attorneys for StratFS, LLC (f/k/a Strategic
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/s/ Terrence M. Connors
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*Attorneys for Individual Defendant Ryan
Sasson and Relief Defendants Daniel
Blumkin and Ian Behar, and related Relief
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/s/ Rodney O. Personius
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Exhibit A

Salesforce: This is our customer relationship management system for all client services. There is currently an overdue bill of \$1,750,000 that we believe is for annual services. Our hope is to convince this vendor to give us a new contract with billing only for the amount of people we currently have active and change to a monthly billing cycle.

HOV Excela: This is the vendor that scans all client mail to source litigation, creditor movement, creditor important messages to clients including broken payments or completed settlements, etc. We need to contact them and let them know what's going on with the company and figure out a way to cancel any services that are no longer necessary.

8X8: This is Strategic's phone system. Like above we need to inform, negotiate and pay for the phones to remain active.

Box: This is the digital storage company that houses all the important documents related to every client's file. Like above, we need to inform, negotiate and pay for the phones to remain active.

Microsoft 365 and Azure: This company is all the emails, worksheets, and storage for the company. Like above we need to inform, negotiate and pay for the phones to remain active.

Freed Maxick —Accountants and tax preparers. Others include internet, fax, etc.

EXHIBIT D



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March 15, 2024

Via Email (rop@personiusmelber.com)

Rodney O. Personius
Personius Melber, LLP
2100 Main Place Tower
350 Main Street
Buffalo NY, 14202

Re: *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.*
U.S. District Court (W.D.N.Y.), Case No. 1:24-cv-00040-EAW-MJR

Dear Mr. Personius:

The Preliminary Injunction ("PI") issued by the Court contains numerous obligations for your clients, Mr. Blust, Lit Def Strategies, LLC, and Relialit, LLC. These are similar to the obligations under the TRO. Compliance with these court-ordered obligations requires that your clients take affirmative steps to comply, including those discussed below.

Your clients are obligated to read and comply with all applicable provisions of the PI Order. Several of these obligations have not been satisfied by your clients to date. We ask that you instruct your clients to take all steps to ensure compliance with their obligations under the PI as soon as possible. We request that you let us know by March 20th when and how your clients will come into compliance with their obligations.

While it is your clients' responsibility to comply with the PI, for the sake of clarity, we highlight numerous steps that are of particular interest to the Receiver. First, we call your clients' attention to their obligations under Section XIV of the PI, which calls for them to immediately transfer or deliver access to and possession, custody, and control of their Assets, all of their Documents and ESI, and all of their keys and computer passwords. The Receiver stands ready to receive these items. Also, pursuant to Section XI of the PI, your clients, as Receivership Defendants, must, among other things, allow the Receiver access to Defendants' business premises, must immediately identify all of Defendants' business premises and storage facilities, must provide the Receiver with any necessary means of accessing, copying, and forensic imaging of Documents, must provide keys and combinations to business premises locks, must provide passwords to devices that hold ESI, and must provide computer access codes of all computers used to conduct business, and must otherwise cooperate with the Receiver. Section XIV obligates your clients to deliver all Receivership Property to the Receiver. Again, the Receiver stands ready to receive these things and hear your clients' plans for compliance.

Personius Melber, LLP
March 15, 2024
Page 2

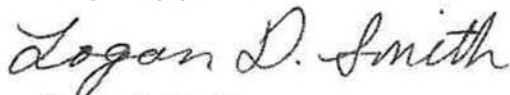
Specifically, we request that your clients direct their attention to providing the following:

1. Administrative access to (including providing all administrative credentials/passwords for) Lit Def's email systems (Microsoft, etc.). We know that Lit Def's emails were in use and operational and that they continued to be accessed after the issuance of the TRO. For instance, former Lit Def employees, including Michelle Hinds as well as others, had and have her own Lit Def email addresses that were assigned to them. We believe that those email addresses remain operational, and although your client claims these employees do not work for Lit Def any more, Ms. Hinds or others continue to review and receive emails at those email addresses, even where they respond to those emails, using Fidelis emails.
2. Administrative access to (including providing all administrative credentials/passwords for) Chats, which Lit Def's employees used;
3. Administrative access to (including providing all administrative credentials/passwords for) all other electronic materials for Lit Def;
4. Access to all financial and accounting information for Lit Def; and
5. Access to all other business records for Lit Def, including payroll and employment records.

While we highlight these obligations, there are other additional obligations contained in the PI, which will require affirmative steps be taken by your clients. Many of their obligations (such as providing administrative passwords) can be accomplished quickly.

Please respond by the close of business on Wednesday, March 20th whether your clients intend to abide by the PI and in particular the obligations set out above and their plan for compliance.

Very truly yours,

A handwritten signature in cursive script that reads "Logan D. Smith".

Logan D. Smith

LDS:jej

EXHIBIT E

Rodney O. Personius

From: Rodney O. Personius
Sent: Monday, March 25, 2024 9:52 AM
To: Logan Smith
Cc: Thomas McNamara; James C. Thoman
Subject: RE: Jason Blust

Logan: The update is that we now have received data that we will review for responsiveness and then produce if responsive. Rod Personius

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From: Rodney O. Personius
Sent: Sunday, March 24, 2024 5:02 PM
To: Logan Smith <lsmith@mcnamarallp.com>
Cc: Thomas McNamara <tmcnamara@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>
Subject: RE: Jason Blust

To be more specific, I understand there is an "access" issue. RP

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From: Rodney O. Personius
Sent: Sunday, March 24, 2024 4:59 PM
To: Logan Smith <lsmith@mcnamarallp.com>
Cc: Thomas McNamara <tmcnamara@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>
Subject: RE: Jason Blust

Logan: As far as I know, we still have not received the Lit Def financials and accounting data (item #4 on page 2 of your March 15th letter). We will follow up tomorrow. Rod Personius

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From: Rodney O. Personius
Sent: Friday, March 22, 2024 5:29 PM
To: Logan Smith <lsmith@mcnamarallp.com>
Cc: Thomas McNamara <tmcnamara@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>
Subject: RE: Jason Blust

Logan: As of now (5:25 pm ET), we have not been provided with the promised information regarding Lit Def's financials and accounting data (item #4 on page 2 of your March 15th letter). JB did send an email inquiry to the vendor about an hour ago, but has not received a response. We will monitor this over the weekend. Sorry for the delay. Rod Personius

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From: Rodney O. Personius
Sent: Wednesday, March 20, 2024 9:02 PM
To: 'Logan Smith' <lsmith@mcnamarallp.com>
Cc: Thomas McNamara <tmcnamara@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>
Subject: RE: Jason Blust

Logan: This email constitutes our response to your correspondence dated March 15, 2024.

With respect to business premises, the current location of operations is 211 W Wacker, Suite 900B, Chicago; however, the lease expires on March 31, 2023 and will not be renewed.

With respect to administrative access to Lit Def's email systems and Chats (items #1 and 2 on page 2 of your letter), we are forwarding a separate email dated 3/20/24 at 11:58 am, which contains this information.

With respect to administrative access to other Lit Def electronic materials (item #3 on page 2 of your letter), we are forwarding a separate email dated 3/20/24 at 10:59 am, which contains this information. Please note that these materials contain attorney client information. We are not authorized to waive any applicable privilege.

With respect to administrative access to Lit Def's financial and accounting information (item #4 on page 2 of your letter), as we have noted, this information should be available by Friday, March 22nd, and will be forwarded at that time. We understand the delay in making this information available arises from the need to separate out the pertinent Lit Def data from other materials.

With respect Lit Def's payroll and employment records (item #5 on page 2 of your letter), we are forwarding a separate email dated 3/20/24 at 3:12 pm, which contains this information.

With respect to the records of Client First Bankruptcy, in accordance with our recent email exchange, arrangements are being made, the expense of transport and storage notwithstanding, to retain all of these records at a new location. Our best estimate is that these records cover the period 2014 to 2020, contain privileged information, and will not include data pertaining to Relialit, Lit Def, or Fidelis.

Rod Personius

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have received this transmission in error, please notify the sender immediately by e-mail and delete the original message. Thank you for your cooperation.

From: Logan Smith <lsmith@mcnamarallp.com>

Sent: Wednesday, March 20, 2024 5:37 PM

To: Rodney O. Personius <rop@personiusmelber.com>

Cc: Thomas McNamara <tmcnamara@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>

Subject: RE: Jason Blust

Thanks, Rod. An email is fine, though I don't have a strong preference.

Regards,

Logan

From: Rodney O. Personius <rop@personiusmelber.com>

Sent: Wednesday, March 20, 2024 2:33 PM

To: Logan Smith <lsmith@mcnamarallp.com>

Cc: Thomas McNamara <tmcnamara@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>

Subject: RE: Jason Blust

EXTERNAL

Logan: Update. We are now told we should also have a substantive response on the 5th item by Friday.

Rod

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From: Rodney O. Personius

Sent: Wednesday, March 20, 2024 4:28 PM

To: Logan Smith <lsmith@mcnamarallp.com>

Cc: Thomas McNamara <tmcnamara@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>

Subject: RE: Jason Blust

Logan: I am sensitive to your request that we respond to your March 15th correspondence by the close of business today.

We have specific updates on 4 of the 5 items outlined on the 2d page of your letter.

My problem at the moment is that I was just called on a new state level criminal matter which has taken my attention for the past hour or so and requires my attention before 5 pm today.

I then have to attend a fundraising event for a local District Attorney candidate, who is a good friend. After that event, I plan to return to the office.

There are 2 options. Later this evening, I can send you an email substantively responding to at least 4 of your requests. Alternatively, I can prepare a letter this evening that would be transcribed and forwarded to you (by email) tomorrow.

Please let me know your preference.

Thank you, Rod

Rodney O. Personius, Esq.
Personius Melber LLP
2100 Main Place Tower
Buffalo, NY 14202
(716) 855-1050 x101
www.personiusmelber.com

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From: Logan Smith <lsmith@mcnamarallp.com>

Sent: Tuesday, March 19, 2024 12:03 AM

To: Rodney O. Personius <rop@personiusmelber.com>

Cc: Thomas McNamara <tmcnamara@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>

Subject: RE: Jason Blust

Hi Rod,

Thanks for your email. While Client First Bankruptcy (CFB) is not a defendant in the case, in the StratFS materials, I have observed a number of documents, particularly CFB emails used by Mr. Blust and Ms. Hinds, among others, in connection with work done relating to several Receivership Defendants (including StratFS & Lit Def). Moreover, Lit Def and Fidelis employees use CFB login credentials to access their work environments. These facts suggest there may well be records relevant to the litigation in the materials your client intends to destroy. While the Receiver can't advise Mr. Blust how to comply with his obligations under the PI, I pass along the above information and concerns.

Regards,

Logan

From: Rodney O. Personius <rop@personiusmelber.com>
Sent: Monday, March 18, 2024 2:27 PM
To: Logan Smith <lsmith@mcnamarallp.com>
Subject: Jason Blust

EXTERNAL

Logan: We acknowledge receipt of your March 15th correspondence.

In speaking to our client about your requests, he mentioned a more pressing issue involving Client First Bankruptcy records.

Currently, he has a reservation with a shredding company to destroy these CFB records this Friday.

As I understand, CFB is not part of the pending litigation.

Does the Receiver object to moving forward with destruction of these CFB files on Friday? Part of the urgency is that the lease for the premises where the records are stored expires at the end of the month.

Thank you, Rod Personius

Rodney O. Personius, Esq.
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EXHIBIT F

Rodney O. Personius

From: Rodney O. Personius
Sent: Wednesday, March 20, 2024 9:04 PM
To: Logan Smith
Subject: FW: Lit Def Strategies - Email Access
Attachments: Lit Def Strategies - Email Access.xlsx

Logan: The attached responds to items ## 1 & 2 on page 2 of your March 15th letter. Rod

Rodney O. Personius, Esq.
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From: Jason Blust <jblust@blustfirm.com>
Sent: Wednesday, March 20, 2024 11:58 AM
To: Rodney O. Personius <rop@personiusmelber.com>; Timothy D. Elliott <TElliott@rathjelow.com>
Subject: Fw: Lit Def Strategies - Email Access

Here is access for #1 and #2

• **Rodney O. Personius**

From: Rodney O. Personius
Sent: Wednesday, March 20, 2024 9:06 PM
To: Logan Smith
Subject: FW: Lit Def Admin

Logan: Below is information responding to the request in item # 3 of your letter, dated March 15th. Rod

Rodney O. Personius, Esq.
Personius Melber LLP
2100 Main Place Tower
Buffalo, NY 14202
(716) 855-1050 x101
www.personiusmelber.com

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From: Jason Blust <jblust@blustfirm.com>
Sent: Wednesday, March 20, 2024 10:59 AM
To: Rodney O. Personius <rop@personiusmelber.com>; Timothy D. Elliott <TElliott@rathjelaw.com>
Subject: Fw: Lit Def Admin

See below - this would be for request #3 admin access for all other electronic materials - for NDS system. Again, this is to access law firm files where work is performed.

From: Charles Connors <cconnors@nationaldatasys.com>
Sent: Wednesday, March 20, 2024 9:55 AM
To: Jason Blust <jblust@blustfirm.com>
Cc: Sean Osborn <stosborn@nationaldatasys.com>
Subject: Re: Lit Def Admin

Jason,

Pursuant to your request, I reviewed our system for the individuals you identified and their respective login names. Below is a list of usernames identified.

We cannot provide passwords because NDS does not have any passwords for any users in the Lit Defense system, or in any system. When a user password is created by the individual user, that is converted by NDS systems into a one way hash value that is encrypted. NDS does not know what the password is, only the user knows what the password is. When a user logs in, the encrypted hash value is compared to the login in order to gain access, and when a password is changed the same process applies. So, as to your specific request for passwords, NDS cannot provide them.

USERNAMES

- M.hinds
- Edgargarcia
- Jkomis
- Vanaya
- S_saavedra

Rodney O. Personius

From: Rodney O. Personius
Sent: Wednesday, March 20, 2024 9:08 PM
To: Logan Smith
Subject: FW: LIT DEF – payroll and employment records
Attachments: Employee Census.pdf; Manual Employee Import.pdf; Master Employee Report.pdf; Paylocity _ Reporting- Position History.pdf; Paylocity _ Reporting.pdf; Payroll Register with ER Taxes.pdf

Logan: The attachments respond to the request in item # 5 of your March 15th letter. Rod

Rodney O. Personius, Esq.
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From: Jason Blust <jblust@blustfirm.com>
Sent: Wednesday, March 20, 2024 3:12 PM
To: Rodney O. Personius <rop@personiusmelber.com>; Timothy D. Elliott <TElliott@rathjelaw.com>
Subject: Fw: LIT DEF - Reports

Here are reports on payroll/employees

From: Lisette Alvarez <lalvarez@gohrtoday.com>
Sent: Wednesday, March 20, 2024 2:02 PM
To: Jason Blust <jblust@blustfirm.com>
Subject: LIT DEF - Reports

Lisette Alvarez

HR Today, LLC

680 S Cache Street

Suite 100-10400

Jackson, WY 83001

EXHIBIT G

Rodney O. Personius

From: Rodney O. Personius
Sent: Tuesday, March 26, 2024 6:02 PM
To: Logan Smith
Cc: Thomas McNamara; James C. Thoman
Subject: FW: LDS Reports
Attachments: LDS Reports.zip

Categories: Actionstep

Logan: Attached and below is information that is responsive to question #4 at page 2 of your correspondence, dated March 15, 2024.

Let us know please if you have any questions or concerns regarding our full set of responses to your March 15th requests.

Thank you, Rod Personius

Rodney O. Personius, Esq.
Personius Melber LLP
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Buffalo, NY 14202
(716) 855-1050 x101
www.personiusmelber.com

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From: Jason Blust <jblust@blustfirm.com>
Sent: Monday, March 25, 2024 7:27 PM
To: Rodney O. Personius <rop@personiusmelber.com>
Subject: LDS Reports

I have resent the LDS QBs file, the password to access is [REDACTED] You may need a QBs subscription to access.

Also, I am attaching a copy of the P&L as well as a copy of all the transactions in excel format.

Thanks.

Accountant's Copy File Available

An Accountant's Copy Transfer File is now available for download on the Intuit Accountant's Copy File Transfer secure server. Click the link and then click **Save** in the File Download dialog. Save the file in any convenient location.

About this Accountant's Copy Transfer File:

File Name: LitDef Strategies, LLC (QuickBooks22. 0 Acct
Transfer Mar 24,2024 11 30 PM).QBX
Sent by: Javier Avila, javila@k2fnm.com
Uploaded: 2024-03-25 04:31
Expires: **2024-04-08**

What Next?

No automatic notification is sent to your client when you download the file. Please contact your client to confirm receipt of this file.

To use the transfer file, start QuickBooks Accountant Edition. On the **File** menu, choose **Send Company File > Accountant's Copy > Open & Convert Transfer File**. The system will prompt you for a password to decrypt the file. Your client must give you that password.

EXHIBIT H

Rodney O. Personius

From: Rodney O. Personius
Sent: Friday, March 29, 2024 8:44 AM
To: Thomas McNamara
Subject: Fwd: Passwords

Please see below Tom.

Personius Melber LLP
2100 Main Place Tower
Buffalo, New York 14202
phone: (716) 855-1050
fax: (716) 855-1052
mobile: (716) 515-8763

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Begin forwarded message:

From: Jason Blust <jblust@blustfirm.com>
Date: March 29, 2024 at 8:38:51 AM EDT
To: "Rodney O. Personius" <rop@personiusmelber.com>
Subject: Passwords

I reset again, tested, and was able to log into both accounts with the email and passwords below.

Jessica Ennenbach jennenbach@litdefstrategies.com
Katherine Rosenberg krosenberg@litdefstrategies.com

Rodney O. Personius

From: Rodney O. Personius
Sent: Thursday, March 28, 2024 5:18 PM
To: Thomas McNamara
Subject: Re: [EXT] FW: Email Info

Sorry. We'll try again.

Personius Melber LLP
2100 Main Place Tower
Buffalo, New York 14202
phone: (716) 855-1050
fax: (716) 855-1052
mobile: (716) 515-8763

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On Mar 28, 2024, at 12:07 PM, Thomas McNamara <tmcnamara@mcnamarallp.com> wrote:

Rod,

See below. Thanks.

Tom

Thomas W. McNamara
McNamara Smith LLP
655 W. Broadway
Suite 900
San Diego, CA 92101
General Line: 619-269-0400
Direct: 619-269-0499

tmcnamara@mcnamarallp.com

<https://mcnamarallp.com>

From: Lars Schou <lars.schou@ankura.com>

Sent: Thursday, March 28, 2024 9:05 AM

To: Thomas McNamara <tmcnamara@mcnamarallp.com>

Cc: Keegan Galvin <kgalvin@mcnamarallp.com>; Project Stratfs <Ankura_Project_Stratfs@ankura.com>

Subject: RE: [EXT] FW: Email Info

EXTERNAL

Tom,

Neither of these work, unfortunately.

In the case of Ennenback, the password is nearly identical to the one previously provided in the spreadsheet, only the last character is capitalized.

For Rosenberg, the password provided is identical as the one in the spreadsheet.

If defense counsel want to test other passwords before sending them to you, they can do so here

<http://email.litdefstrategies.com/>

Regards,

Lars

--

Lars Schou

Senior Director – Digital Forensics - Americas

lars.schou@ankura.com

415-470-6010 - Mobile

<image001.png>

ankura.com

From: Thomas McNamara <tmcnamara@mcnamarallp.com>

Sent: Thursday, March 28, 2024 8:31 AM

To: Lars Schou <lars.schou@ankura.com>

Cc: Keegan Galvin <kgalvin@mcnamarallp.com>

Subject: [EXT] FW: Email Info

Lars,

See below. Thanks.

Thomas W. McNamara
McNamara Smith LLP
655 W. Broadway
Suite 900
San Diego, CA 92101
General Line: 619-269-0400
Direct: 619-269-0499
tmcnamara@mcnamarallp.com
<https://mcnamarallp.com>

From: Rodney O. Personius <rop@personiusmelber.com>
Sent: Thursday, March 28, 2024 6:24 AM
To: Thomas McNamara <tmcnamara@mcnamarallp.com>
Subject: Fwd: Email Info

EXTERNAL

Pls see below, Tom

Personius Melber LLP
[2100 Main Place Tower](#)
[Buffalo, New York 14202](#)
phone: [\(716\) 855-1050](tel:(716)855-1050)
fax: [\(716\) 855-1052](tel:(716)855-1052)
mobile: [\(716\) 515-8763](tel:(716)515-8763)

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Begin forwarded message:

From: Jason Blust <jblust@blustfirm.com>
Date: March 28, 2024 at 9:21:07 AM EDT
To: "Rodney O. Personius" <rop@personiusmelber.com>
Subject: Email Info

Jessica

Ennenback

jennenback@litdefstrategies.com

[REDACTED]

Katherine

Rosenberg

krosenberg@litdefstrategies.com

[REDACTED]

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Rodney O. Personius

From: Rodney O. Personius
Sent: Wednesday, March 27, 2024 2:16 PM
To: Thomas McNamara
Cc: Logan Smith; James C. Thoman; Jill Jacobs
Subject: RE: Need correct credentials for two Lit Def accounts

Yes

Rodney O. Personius, Esq.
Personius Melber LLP
2100 Main Place Tower
Buffalo, NY 14202
(716) 855-1050 x101
www.personiusmelber.com

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From: Thomas McNamara <tmcnamara@mcnamarallp.com>
Sent: Wednesday, March 27, 2024 2:14 PM
To: Rodney O. Personius <rop@personiusmelber.com>
Cc: Logan Smith <lsmith@mcnamarallp.com>; James C. Thoman <jthoman@hodgsonruss.com>; Jill Jacobs <jjacobs@mcnamarallp.com>
Subject: Need correct credentials for two Lit Def accounts

Rod,

I heard from our data forensics vendor this morning that the credentials provided for Katherine Rosenberg and Jessica Ennenbach did not work. Either the email addresses or passwords provided are incorrect. Can you please look into this? Thanks.

Tom

Thomas W. McNamara
McNamara Smith LLP
655 West Broadway, Suite 900
San Diego, CA 92101
Direct: 619-269-0499
Main: 619-269-0400
Fax: 619-269-0401
tmcnamara@mcnamarallp.com